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11 *Attorneys for Defendant*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14
15 INTERNATIONAL PAYMENT ADVISORS
LTD, a Nevada limited liability company,

16 Plaintiff,

17 v.

18 PAYSAFE SERVICES (US) LLC, a Delaware
Corporation; and DOES 1-10 inclusive,

19 Defendants.
20

Case No.: 2:19-cv-203-RFB-VCF

Stipulation and Proposed Order to Extend
the Time for Defendant to Respond to the
Complaint and Modify the Briefing
Schedule

21 Plaintiff International Payment Advisors LTD (“Plaintiff”), by and through its counsel of
22 record, Kravitz, Schnitzer & Johnson, Chtd., and Glaser Weil Fink Howard Avchen & Shapiro LLP,
23 and Defendant Paysafe Services (US) LLC, (“Defendant”) by and through its counsel of record,
24 Greenberg Taurig, LLP, hereby stipulate and request that the Court: (1) extend the time by which
25 Defendant must respond to the Complaint by thirty (30) days, up to, and including, **March 29, 2019**;
26 and (2) modify the briefing schedule to provide Plaintiff with thirty (30) days to respond to any motion
27 filed by Defendant under Fed. R. Civ. P. 12, should Defendant elect to file such a motion in lieu of
28 an Answer.

1 This stipulation is made and based upon the following:

2 1. Plaintiff filed its Complaint on February 1, 2019, in which it alleges that Defendant
3 committed certain breaches of contract and of the implied covenant of good faith and fair dealing.
4 ECF No. 1.

5 2. Defendant was served with the Complaint on February 6, 2019. ECF No. 5.
6 Defendant's response is currently due February 27, 2019. *Id.*

7 3. Counsel for Defendant has recently been engaged and requires additional time to
8 evaluate Plaintiff's allegations and prepare a response, taking into account the exercise of due
9 diligence.

10 4. In light of the foregoing, the parties agree that Defendant shall have up to, and
11 including, **March 29, 2019**, to respond to the Complaint.

12 5. Should Defendant elect to file a motion under Fed. R. Civ. P. 12 in lieu of an Answer,
13 Plaintiff shall have thirty (30) days in which to file its opposition.

14 6. This is the first request for an extension of time or for a modified briefing schedule.
15 This stipulation is entered into in good faith and not for purposes of delay.

16 DATED this 25th day of February 2019.

DATED this 25th day of February 2019.

17 **KRAVITZ, SCHNITZER & JOHNSON,**
18 **CHTD.**

GREENBERG TRAURIG, LLP

19 /s/ Adam Wax

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25 *Attorneys for Defendant*

26 **IT IS SO ORDERED.**

27 

28 Cam Ferenbach

United States Magistrate Judge

Dated this 26th day of February, 2019.